Norgaard O'Boyle 184 Grand Avenue Englewood, New Jersey 07631 Telephone Number (201) 871-1333 Telecopier Number (201) 871-3161 Attorneys for Debtor By: Brian G. Hannon, Esq. (BGH – 3645)

In Re:

Tracy E. Ralph

Debtor.

UNITED STATES BANKRUPTCY FOR THE DISTRICT OF NEW JERSEY NEWARK VICINAGE

Chapter 13

Case No. 17-27833 (RG)

HEARING DATE: July 18, 2018

CERTIFICATION IN RESPONSE TO THE STANDING TRUSTEE'S OPPOSITION TO THE MOTION TO APPROVE LOAN MODIFICATION

- I, Brian G. Hannon, Esq. certifies as follows:
- 1. I am a partner of Norgaard O'Boyle, counsel to the Debtor in the above-referenced matter. I write this certification in response to the opposition filed by the Standing Trustee to the Motion to Approve Loan Modification.
- 2. Standing Trustee filed her opposition to the Motion to Approve Loan Modification stating that an amended plan should be filed to reflect the additional surplus created by the loan modification. The Debtor has filed a modified Chapter 13 plan which increases the monthly payment to the trustee moving forward due to the additional surplus created by the modified mortgage payment amount.
- 3. That being said, the Debtor's Motion to Approve Loan Modification should be granted accordingly.

Filed 06/12/18 Entered 06/12/18 12:19:47 Desc Main Case 17-27833-RG Doc 70 Document Page 2 of 2

I certify that the foregoing statements are true. I am aware that if the foregoing statements are willfully false, I am subject to punishment.

> NORGAARD O'BOYLE Attorney for the Debtor

By: <u>/s/ Brian G. Hannon</u> Brian G. Hannon, Esq. Dated: June 12, 2018